

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HERMINE BYFIELD,

Plaintiff,

vs.

HEALTHCARE REVENUE RECOVERY
GROUP, LLC; and DOES 1 through 10, inclusive

Defendants.

CIVIL ACTION
NO. 2:18-CV-00243-PBT

**DEFENDANT HEALTHCARE REVENUE RECOVERY GROUP, LLC'S MOTION FOR
EXTENSION OF TIME TO COMPLETE FACT DISCOVERY**

Defendant, Healthcare Revenue Recovery Group, LLC (hereinafter "HRRG" or "Moving Defendant"), by and through its undersigned counsel, Marks, O'Neill, O'Brien, Doherty & Kelly, P.C., hereby moves for a thirty (30) day extension of time to complete fact discovery. In support, Moving Defendant avers as follows:

1. Plaintiff initiated this putative class action by filing a Complaint on January 19, 2018. Pl. Compl. (ECF No. 1).
2. Plaintiff alleges that HRRG violated the Fair Debt Collection Practices Act ("FDCPA") by sending a letter dated August 3, 2017 seeking to collect a debt allegedly incurred for medical expenses for treatment of injuries Plaintiff sustained in a motor vehicle accident.
3. Due to challenges attendant to the Covid-19 pandemic and unsuccessful efforts by the Parties to schedule a Settlement Conference until recently, the completion of discovery in this matter had been delayed.
4. By Order of April 29, 2021, the Court at the request of the Parties stayed discovery while the Parties participated in a Settlement Conference with Magistrate Judge Henry S. Perkin that was held on May 5, 2021. (ECF No. 40).

5. Pursuant to the Court's April 29, 2021 Order, all fact discovery in this matter currently must be completed by July 6, 2021.

6. The undersigned wrote to the Court by letter of June 10, 2021 to provide a status update and requesting to extend the time to complete discovery by thirty (30) days. *A true and correct copy of the undersigned's June 10, 2021 letter is attached as Exhibit "A."*

7. As explained in the undersigned's June 10, 2021 letter, due to scheduling conflicts of counsel and the Parties and professional and personal conflicts of counsel relating to other matters, the Parties have been unable to complete full discovery.

8. The Parties are in the process of exchanging written discovery and need additional time to complete depositions of the principal Parties and other third-party witnesses.

9. Counsel for Moving Defendant have conferred with Plaintiff's counsel, who has consented to this request.

10. Counsel believe that fact discovery can be completed on or before August 6, 2021.

11. There have been no prior requests for any extensions of the deadlines.

12. There is no trial date scheduled or any other Court scheduled events that will be delayed as a result of this extension.

13. Moving Defendant respectfully submits that good cause exists for the requested extension of the deadlines.

WHEREFORE, Defendant, Healthcare Revenue Recovery Group, LLC respectfully request that this Honorable Court grant its Motion and extend the case management deadlines by thirty (30) days.

Respectfully submitted,

/s/ Cecil J. Jones

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Attorneys for Defendant,

Healthcare Revenue Recovery Group, LLC

Dated: June 29, 2021